UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: MICHAEL STEVEN SPANGLER and : CHAPTER 13
        LISA MARIE SPANGLER :
          Debtor(s) :
          :
        CHARLES J. DEHART, III :
        STANDING CHAPTER 13 TRUSTEE :
          :
            vs. :
          :
        MICHAEL STEVEN SPANGLER and :
        LISA MARIE SPANGLER :
          Respondent(s) : CASE NO. 1-17-bk-00450

TRUSTEE'S OBJECTION TO AMENDED CHAPTER 13 PLAN

     AND NOW, this   8th   day of September, 2017, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

     1.   Debtor(s)' plan violates 11 U.S.C. Sec. 1322(a)(1) in that the debtor(s) has not submitted all or such portion of the disposable income to the Trustee as required.

     2.   The Trustee avers that debtor(s)' plan is not feasible based upon the following:

         a.   Plan pays secured claim on residence with non-exempt proceeds
            from sale of LLC interest.

     3.   Trustee avers that debtor(s)' plan is not feasible and cannot be administered due to the lack of the following:

         a.   Copy of listing agreement for 916 Leisters Church Road,
            Westminster, Maryland.
     .
     WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

         a.   Deny confirmation of debtor(s) plan.

b. Dismiss or convert debtor(s) case.
c. Provide such other relief as is equitable and just.

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Respectfully submitted:

Charles J. DeHart, III
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

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BY: /s/James K. Jones
                    Attorney for Trustee

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CERTIFICATE OF SERVICE

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AND NOW, this   8th   day of September, 2017, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Larry Wolf, Esquire
215 Broadway
Hanover, PA   17331

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/s/Deborah A. Behney
Office of Charles J. DeHart, III
Standing Chapter 13 Trustee

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